

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:

MINING PROJECT WIND DOWN HOLDINGS, INC.  
(f/k/a Compute North Holdings, Inc.), *et al.*,<sup>1</sup>

Debtors.

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) Chapter 11

) Case No. 22-90273 (MI)

) (Jointly Administered)

) **Re: Docket No. 915**

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**DEBTORS' OMNIBUS RESPONSE TO ROHIT SHIROLE'S (I) EMERGENCY MOTION  
TO REDUCE DEADLINES FOR DISCOVERY AND COMPEL DISCOVERY  
RESPONSES, (II) OBJECTION TO PLAN CONFIRMATION, (III) EMERGENCY  
MOTION FOR TEMPORARY ALLOWANCE OF CLAIMS FOR VOTING PURPOSES,  
AND (IV) MOTION FOR RELIEF FROM STAY**

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In response to (i) *Rohit Shirole's Emergency Motion to Reduce Deadlines for Discovery and Compel Discovery Responses in Anticipation of Emergency Motion for Temporary Claim Allowance Pursuant to Bankruptcy Rule 3018, Pursuant to Bankruptcy Rules 7037, 9006(c), 9014, and 11 U.S.C. § 105* [Docket No. 913], (ii) *Rohit Shirole's Objection to Final Approval of the Disclosure Statement and Confirmation of the Debtors' Third Amended Joint Liquidating Chapter 11 Plan, Joinder, and Reservation of Rights* [Docket No. 894], (iii) *Rohit Shirole's Emergency*

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Debtors' service address for the purposes of these chapter 11 cases is 300 North LaSalle, Suite 1420, Chicago, Illinois 60654.

*Motion for Temporary Allowance of Claims as Amended, for Purposes of Voting Pursuant to Fed. R. Bank. P. 3018(a) and Other Relief Pursuant to 11 U.S.C. § 105* [Docket No. 874], and (iv) *Rohit Shirole's Motion for Relief Under 11 U.S.C. § 362(d) from Automatic Stay to Continue Litigation Against Certain Debtors and Waiver of 30-Day Hearing Requirement* [Docket No. 342] (the "Lift Stay Motion"), the above-captioned debtors and debtors in possession (collectively, the "Debtors") respectfully state as follows:

1. Rohit Shirole ("Shirole") has filed a number of pleadings in these Chapter 11 Cases.
2. The Court held a hearing on Shirole's Lift Stay Motion on January 17, 2023 and since that hearing the Debtors have been working to resolve Shirole's Lift Stay Motion. To that end, the Debtors were able to obtain confirmation from one of their insurance providers that defense costs of this matter would be covered by the policy. Scottsdale Insurance Company, the insurer under the Debtors' employment practices policy, agreed to defend the Debtors with respect to the case styled *Rohit Shirole v. Compute North Holdings, Inc. and Compute North LLC*, Case No. 22-CV-22-2274, pending in the Fourth Judicial District for the State of Minnesota, Hennepin County, subject to a reservation of rights and the policy's applicable self-insured retention.
3. This confirmation of insurance policy coverage led to further discussions with Shirole and the Official Committee of Unsecured Creditors (the "Committee"), which has resulted in the resolution of all pending pleadings Shirole has filed with the Court.
4. Accordingly, the Debtors are pleased to inform the Court they have reached an agreement with Shirole and the Committee on a process for liquidating Shirole's claims and addressing any residual issues in the future as set forth in the Agreed Order attached hereto as Exhibit A, which resolves all pending pleadings Shirole has filed with the Court as these pleadings are deemed withdrawn.

WHEREFORE, the Debtors respectfully request entry of the Agreed Order, granting the relief requested and such other and further relief as the Court deems appropriate under the circumstances.

Dated: February 6, 2023  
Houston, Texas

/s/ James T. Grogan III

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*Counsel to the Debtors and Debtors in Possession*

**Certificate of Service**

I certify that on February 6, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ James T. Grogan III  
James T. Grogan III